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March 6, 2024

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Honorable Sean H. Lane  
United States Bankruptcy Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: Rudolph W. Giuliani  
Chapter 11 Case No: 23-12055

Dear Judge Lane:

March 5, 2024 was the adjourned Notice of Presentment date for the retention application for Berger, Fischhoff, Shumer, Wexler & Goodman, LLP as Debtor's counsel and Aidala, Bertuna & Kamins, P.C. as special counsel.

The Debtor, the United States Trustee and the Unsecured Creditor Committee are very close to having a consensual proposed order for filing for the Berger, Fischhoff, Shumer, Wexler & Goodman, LLP retention and we expect to file as soon as Thursday. We request that Notice of Presentment date be adjourned until Friday, March 8, 2024.

With respect to Aidala, Bertuna & Kamins, P.C. retention, we are in discussions also for a consensual application and order and expect to have that resolved within the week.

Therefore it is requested that the Notice of Presentment date for the Adala, Bertuna & Kamins, P.C. application be adjourned until March 15, 2024.

Respectfully,  
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Gary C. Fischhoff